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March 7, 2014

Via Electronic Comment Filing System

Ms. Marlene H. Dortch
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

Re: WC Docket No. 10-90 –Expression of Interest in Conducting Rural Broadband Experiment

Dear Ms. Dortch:

Enclosed for electronic filing via the Electronic Comment Filing System ("ECFS") in compliance with Federal Communications ("FCC") Order, FCC 14-5, is the attached non-binding Expression of Interest ("EOI") for BTC, Inc. ("BTC") regarding the Connect America Phase II network experiments. BTC appreciates the opportunity to file the non-binding EOI.

If you have any questions or concerns on the attached EOI, please contact me.

Respectfully Submitted,

Chuck Deisbeck
CEO
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Attachments (Non-binding EOI)

Non-Binding Expression of Interest – Phase II Rural Broadband Experiment

BTC, Inc., (“BTC”) submits this Expression of Interest (“EOI”) for Connect America Phase II Rural Broadband Experiments per Federal Communications Commission (“FCC”) Order, FCC 14-5. This is stage 1 of the FCC’s Phase II experiment proposals and BTC anxiously awaits release of the Stage 2 formal proposal requirements.

Background

BTC has a long and proven success rate of deploying rural high-speed last mile broadband networks. BTC, a subsidiary of Breda Telephone Corp. dba Western Iowa Networks (WIN), has been in the telecommunications industry since 1905. WIN is a leading communications company, based in Breda, Iowa, and is one of western Iowa’s largest independent telephone companies. We are dedicated to deploying high quality voice and broadband services in each of our exchange service areas. We are one of the area’s most diverse service providers. As a competitive local exchange carrier (“CLEC”), BTC has Eligible Telecommunication Carrier (“ETC”) status within Carroll County. BTC would need to proceed with obtaining CLEC authority through the Iowa Utilities Board for Crawford County should the FCC grant funding to BTC under the Rural CAF Experiment fund.

Proposed Service Area

The proposed service area covers census tracts within the counties of Carroll and Crawford Iowa. Each of the below listed tracts is contiguous to the existing service areas where BTC, or a related company, is presently offering voice, and data services. The Carroll County census tracts are contiguous to service areas where IPTV and CATV are additionally offered over fiber networks. The applicable census tract numbers include the following:

Carroll County, Iowa

State	County	County Name	Tract ID
IA	19027	Carroll	19027960100
IA	19027	Carroll	19027960200
IA	19027	Carroll	19027960500
IA	19027	Carroll	19027960600

The proposed census tracts listed above would ensure coverage for the entire county of Carroll. The listed tracts touch BTC’s present exchange boundaries on all sides. BTC has been dedicated to advancing its network with Fiber-to-the-Home (FTTH). Within the last six years, BTC has successfully built FTTH in all of its Carroll County Exchanges and is committed to continue to build out FTTH where feasible. The existing FTTH network in Carroll County would facilitate additional expansion in all directions from our present exchange boundaries within the listed census tracts.

Crawford County, Iowa

State	County	County Name	Tract ID
IA	19047	Crawford	19047070100

The proposed tract listed for Crawford County would touch our present Westside exchange boundaries on two sides. We have built out this small exchange with both an in-town and out-of-town fiber network. The Westside exchange facilities would aide in our ability to expand our reach out from our present exchange within the listed tract.

The projects are estimated to provide broadband access to a total of 781 locations identified on the Eligible High Cost Location spreadsheet per the FCC Public Notice, once completed. BTC would propose to provide service, however, to every location within the census tract.

BTC has been and continues to be committed to being a strong supporter of the communities it serves. The proposed projects in this EOI would allow for BTC to expand its ability to aide community anchor institutions by reaching out to the rural areas that have been lacking broadband. In Carroll County, we would be able to assist the St. Anthony Regional Healthcare Center Clinics located in the towns of Coon Rapids, Breda, and Manning. With Carroll and Crawford counties being adjacent, we would also tie to the St. Anthony Regional Healthcare Center Clinics located in the town of Westside. There is potential to serve other community anchor institutions as well. BTC will continue to research opportunities that will enable broadband to be utilized by community anchor institutions in the proposed service areas.

Broadband Technology

As part of this EOI, BTC is proposing two different broadband technology designs for the service areas in both Carroll and Crawford County. The first design would be considered a short-term proposal for a fixed, Point-To-MultiPoint (“PMP”) Broadband Wireless Access (“BWA”), utilizing dual spectrum incorporating WiMAX technology on 3.65 GHz and wireless broadband on 5.0 GHz. This would be a least cost alternative and a less robust proposal for future broadband needs

The second proposal would be a FTTH project. While a FTTH design may be the most costly alternative, it would provide for the most diverse service applications. In addition, FTTH would provide almost unlimited capacity, which would fulfill the explosive demand for broadband capacity that BTC is experiencing today. It is expected that fiber networks will continue to develop and advance to meet unknown, future consumer demands. With a FTTH design, there should be unlimited applications and broadband capacity to encourage economic development. People in the proposed service areas would be able to engage in new applications or activities, such as start-up businesses; rural work-from-home applications; security applications; joint partnerships with local utilities for smart grid technology.

Service Offerings

The service offerings anticipated by BTC in the proposed service areas are voice service, high-speed broadband service, and video service at rates that are competitive and comparable to service offerings in the neighboring towns. The following service tiers are expected to be available to all homes and businesses passed, including community anchor institutions within the proposed project area:

Voice over Internet Protocol Phone (VoIP) Service

Broadband Speed Tiers:

a) Wireless Packages

5Mbps / 1Mbps
8Mbps / 2Mbps

b) FTTH Packages:

5Mbps/1Mbps
8Mbps/2Mbps
12Mbps/3Mbps
20Mbps/5Mbps
30Mbps/20Mbps
50Mbps/20Mbps
100Mbps/20Mbps

Video Services: As discussed in more detail below, BTC is proposing to partner with neighboring telecommunication providers. In the event BTC is able to consolidate video services between the proposed partners, which would make video services a cost effective service to offer, we would anticipate being able to provided three video packages as follows:

Basic Package
Expanded Package
Supreme Package

BTC anticipates the proposed Carroll County project would be completed two (2) years from the start of construction. The wireless overlay would be able to be completed within 2 –3 years with a FTTH overbuild being completed within 2 – 4 years. It is anticipated the proposed Crawford County project would also be completed 2 years from the start of construction. The wireless overlay would be able to be completed within 1 – 2 years with the FTTH overbuild being completed within 2 – 3 years.

Partnerships

BTC is proposing to partner with our neighboring telecommunication providers and municipalities in Carroll County which currently provide some type of telecommunications service today, including voice, Internet and video. Preliminary discussions have been held with the telephone companies regarding the potential partnership and the possibilities the Connect America Fund Experiment may provide rural Iowa. Possibilities include, but may not be limited to, the potential to allow economies of scale and allow for the provision of high speed Internet services in areas that are currently served by these small entities. Unfortunately, these locations have been bypassed and remain unserved today due to the high cost nature of the service area. There is a strong interest and desire among these providers to work together to bring broadband to these unserved and underserved locations.

BTC is also proposing to work with the utility providers in our existing service areas in Carroll and Crawford Counties in joint ventures on ways to expand power grids.

Funding

BTC has not completed a detailed engineering study on the proposed projects. However, based on past projects that have been completed, it is estimated that the Carroll County project would have total project costs as follows:

Wireless Overlay - \$6,000,000 to \$6,500,000 (*includes no land acquisition costs*)
Fiber Overbuild – \$30,000,000 to \$36,000,000

It is estimated that the Crawford County project would have total project costs as follows:

Wireless Overlay - \$500,000 to \$700,000 (*includes no land acquisition costs, and costs are dependent on approval of the above-listed Carroll County project*)
Fiber Overbuild – \$5,000,000 to \$7,000,000

The requested funding amount will be based on annual support to continue during the course of the construction timeframe as reflected below.

Carroll County

Wireless Overlay would request annual support of \$2,000,000 each year for 3 Years.
Fiber Overbuild would request annual support of \$9,000,000 each year for 4 Years.

Crawford County

Wireless Overlay would request annual support of \$350,000 each year for 2 Years.
Fiber Overbuild would request annual support of \$2,500,000 each year for 3 Years.

As mentioned above, BTC is proposing two different options. In preparation of submitting a proposal, BTC will better define the project to determine the most feasible and efficient network design that will maximize the service area to be covered. The funding request of BTC is due to the high cost of building a robust, scalable, high-speed broadband and voice network in rural Iowa. Once the final rules and budget for the Rural Connect American Fund Experiment are released by the FCC, BTC will be able to further define the project and applicable costs.

Conclusion

BTC appreciates the opportunity that the Federal Communications Commission is providing by allowing rural CLEC's, like BTC, to submit an Expression of Interest for the Rural Broadband Experiment. BTC was founded with the commitment to bring state-of-art telecommunications, Internet and video services to the residents, businesses and community anchor institutions in Carroll County and to return quality local customer service to the areas. As stated above, BTC is considering either a fixed, Point-To-MultiPoint Broadband Wireless Access design, utilizing wireless broadband technology on 3.65 GHz and 5.0 GHz, which would be a least cost alternative, or a state of the art FTTN overbuild, which would provide a full robust broadband service. By receiving help in funding the proposed project, BTC will be able to reach out to neighboring areas that are lacking access to high-speed broadband services in rural Carroll and Crawford counties in Iowa. The BTC proposed broadband network would provide the residents, businesses, and community anchor institutions with a high-speed and scalable broadband network solution in underserved and unserved areas. By offering advanced technologies, BTC seeks to enhance economic development, add to the quality of life of our customers and keep customers connected to an ever-increasing global community. BTC is committed to providing a scalable and robust network to the residents and businesses seeking a dependable broadband solution.

BTC is an experienced, dedicated, and committed telecommunications provider with the staff and resources to complete the proposed project. Due to the high-cost nature of the proposed service areas, the FCC funding is critical to the timely delivery of broadband service to these unserved and underserved areas. We thank you again for the opportunity to submit this Expression of Interest.